

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE TERRORIST ATTACK
ON SEPTEMBER 11, 2001

Civil Action No. 03 MDL 1570 (RCC)
ECF Case

This document relates to:

The Estate of John P. O'Neill, Sr., et al. v. The Republic of Iraq, et al., 04 CV 1076 (RCC)

NOTICE OF MOTION FOR SANCTIONS

PLEASE TAKE NOTICE that pursuant to Rule 11 of the Federal Rules of Civil Procedure, and upon the memorandum of law and Declaration of Steven K. Barentzen attached hereto, Taha Jabir Al-Alwani, by and through undersigned counsel, will move the Court, before the Honorable Richard C. Casey, U.S.D.J., at the United States District Court, Southern District of New York, 500 Pearl Street, New York, New York, 10007, on at a date and time to be determined by the Court, for an order imposing sanctions on Plaintiffs and their attorneys.

Respectfully submitted,

Dated: November 11, 2005

By: /s/ Nancy Luque

Nancy Luque (NL-1012)
Jay Hanson (admitted *pro hac vice*)
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CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of November, 2005, I caused an electronic copy of the foregoing Notice Of Motion for Sanctions to be served by email upon all parties scheduled for electronic notice.

/s/ Steven K. Barentzen
Steven K. Barentzen (SB-8777)